

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ROLANDO JESSE DAZA-CORTEZ,  
Defendant-Petitioner,

v.

UNITED STATES OF AMERICA,  
Plaintiff-Respondent.


NO. C18-1608RAJ  
(CR15-269RAJ)

UNITED STATES' ANSWER TO  
AMENDED PETITION FILED  
UNDER 28 U.S.C. § 2255  
("PETITIONER'S RESPONSE TO  
GOVERNMENT'S RESPONSE")

Exhibit 15

Email between Prior Counsel Emily Gause and AUSAs Andy Colasurdo and Sarah Vogel

March 5, 2017



**From:** [emily@emilygauselaw.com](mailto:emily@emilygauselaw.com) [<mailto:emily@emilygauselaw.com>]  
**Sent:** Sunday, March 5, 2017 2:10 PM  
**To:** Colasurdo, Andy (USAWAW) <[AColasurdo@usa.doj.gov](mailto:AColasurdo@usa.doj.gov)>  
**Cc:** Vogel, Sarah (USAWAW) <[SVogel@usa.doj.gov](mailto:SVogel@usa.doj.gov)>; Wolgamuth, Karen (USAWAW) <[KWolgamuth@usa.doj.gov](mailto:KWolgamuth@usa.doj.gov)>  
**Subject:** RE: Daza Cortez: Proposed Plea Agreement

Sarah and Andy,

I want to make it clear to both of you that my client was, and still is, willing to resolve this case. He will not, however, be bullied by the government to agree to every fact in the plea agreement as you set forth in your last communication regarding negotiations. He will also not agree to the 7 to 8.5 years as last proposed by the government. These are the sticking points for him. The forfeiture amount as proposed by the government and the counts he pleads guilty to are not a problem.

Given that the government will be spending many resources and time at the upcoming hearing and what will be a lengthy trial in just two weeks, I wanted to ensure the government knows my client's position. While my client is eager to go trial, and feels confident in many of our motions and arguments we will assert at trial, Mr. Daza-Cortez's position would change if he felt that the government was being fair in its offer and communications about resolution.

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